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Approximately 3.3 million of the almost 6 million Americans estimated to be mentally retarded in 1963 were of working age from 16 to 64. This group was expected to increase to 3.7 million by 1970. A study of 2,500 young men rejected from military service for mental reasons found only two-thirds of these in the labor force as compared to 95 percent of all young men aged 18 to 24. It was estimated that over 85 percent of all retarded persons could become capable of some self support if given adequate training and employment opportunities. Service occupations constitute the fastest growing occupational area in which the retarded are likely to qualify for training and employment. The U.S. Vocational Rehabilitation Administration has had considerable success in placing retarded individuals as kitchen workers. Opportunities have been increasing in other likely occupations such as busboy, busgirl, dishwasher, hospital attendant, nurses aide, janitor, charwoman, yardsman, groundskeeper, and landscaping laborer. Several training projects developed by the Manpower Development and Training Act, the federal-state employment services to handicapped applicants, new policies by the Civil Service Commission, and federal legislation offer new training and employment possibilities for the mentally retarded. (EM)

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THE MENTALLY RETARDED:

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U.S. DEPARTMENT OF LABOR: W. WILLARD WIRTZ, Secretary
MANPOWER ADMINISTRATION
Office of Manpower, Automation and Training

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THE MENTALLY RETARDED:

Their Special Training Needs

U.S. DEPARTMENT OF LABOR: W. WILLARD WIRTZ, SECRETARY
MANPOWER ADMINISTRATION
Office of Manpower, Automation and Training

PREFACE

Under the Manpower Development and Training Act of 1962, the Secretary of Labor is required to develop and compile information relating to the manpower situation in the United States. An analysis of the special training needs of the mentally retarded was undertaken in this bulletin because of the underutilization and inadequate training of this segment of our population. This bulletin analyzes the employment potential of the retarded and reviews the status of training available to them.

This report was prepared by Lloyd Feldman under the general supervision of William Paschell, Chief, Division of Manpower Requirements and Resources, Office of Manpower, Automation and Training.

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INTRODUCTION

Approximately 3.3 million of the almost 6 million Americans estimated to be mentally retarded in 1963 were of working age (16 to 64). About 125,000 mentally retarded are born each year.[1] By the next decade, this number is expected to rise to approximately 140,000 annually.[2] Despite the agreement among experts that most of the mentally retarded are capable of supporting themselves through gainful employment,[3] they suffer higher rates of joblessness and participate in the labor force to a lesser degree than workers of average intelligence.

Recognition of their potential for occupational training and the provision of needed training and related rehabilitation services can play a major role in enabling retarded persons to engage in productive work and to participate more fully in the life of the community. However, it is clear that training and related services are available to only a small fraction of the retarded who could benefit from them. It also appears that the training provided is often not in the occupational areas offering the most fruitful employment possibilities to these individuals.

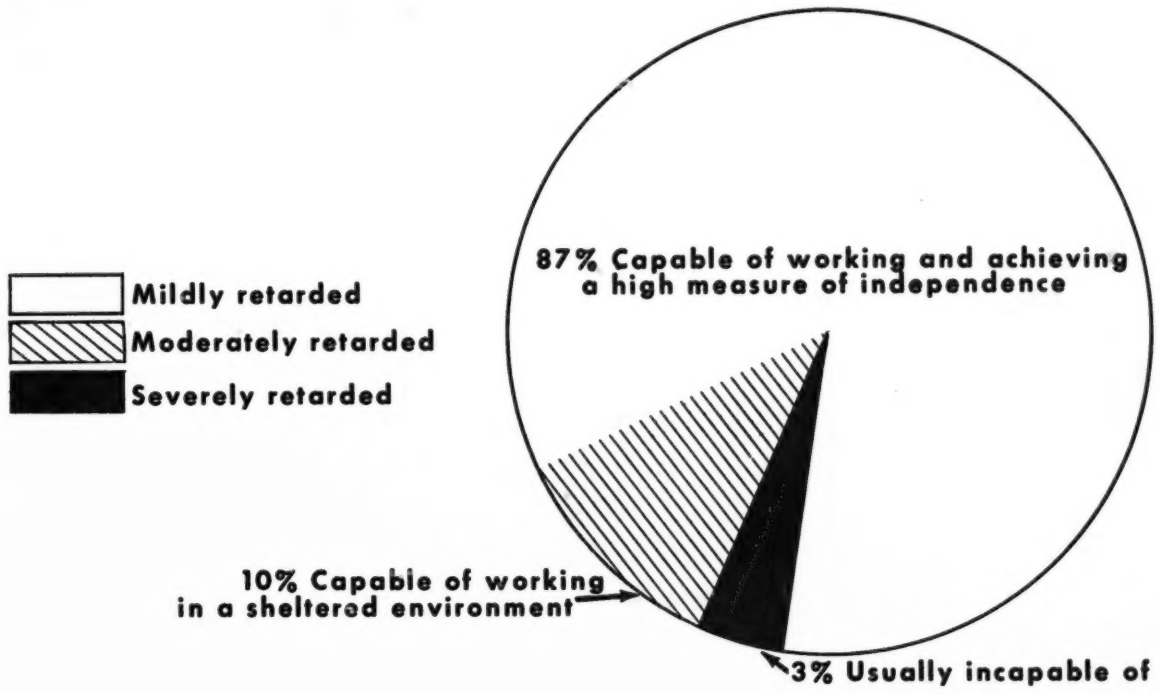
Persons selected for training under regular training programs of the Manpower Development and Training Act attain higher levels of education than the mentally retarded are able to achieve. However, several of the experimental and demonstration programs now in progress under the MDTA are directed toward assisting mentally retarded persons and may provide models for future directions of training of retardates.

Although retarded individuals vary considerably in mental capacity, most can be trained for many unskilled, semiskilled, and service jobs in which abilities other than intelligence are most significant. More than 85 percent of retarded persons of working age in 1963 (approximately 2.9 million) have intelligence quotients (IQ's) between 50 and 70 and are capable of being trained for these less skilled jobs.[4] This report is concerned principally with this large group of the potentially employable retarded who can perform work in a normal, competitive employment situation. While many mentally retarded individuals with lower IQ's (below 50) can perform simple tasks, they generally can do so only under permanently sheltered (closely supervised, noncompetitive) conditions (see chart 1).

The increased personal dignity and sense of achievement which the retarded individual gains from employment are immeasurable. The economic benefits are also considerable. The Vocational Rehibilitation Administration reports that 92 percent of the 5,900 mentally retarded persons rehabilitated in 1963 had no income at the time of

CHART 1

MOST OF THE MENTALLY RETARDED ARE CAPABLE OF ACQUIRING JOB SKILLS


Mildly retarded
Moderately retarded
Severely retarded
87% Capable of working and achieving a high measure of independence
10% Capable of working in a sheltered environment
3% Usually incapable of working

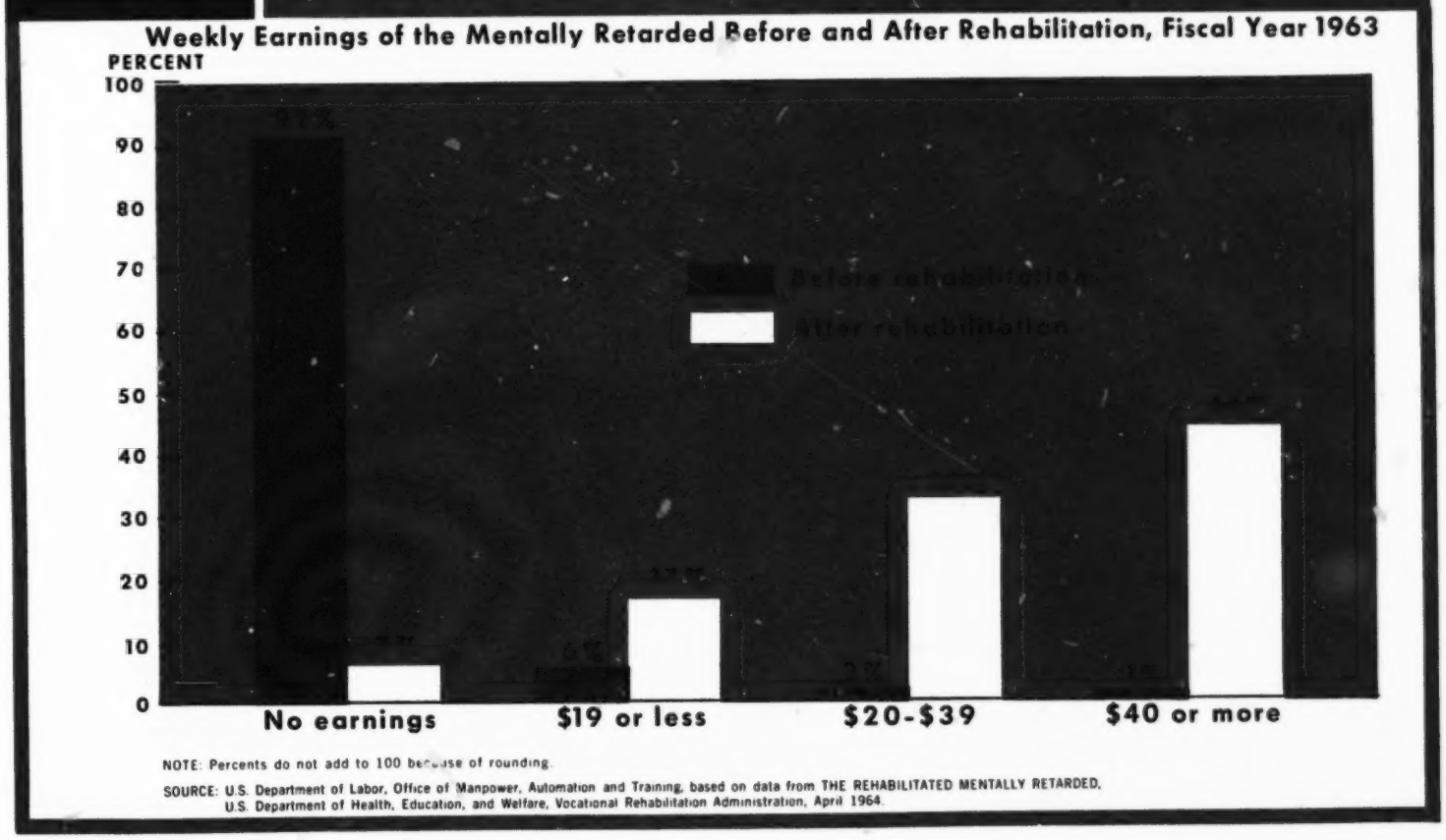
SOURCE: U.S. Department of Labor, Office of Manpower, Automation and Training, based on data from CHART BOOK, MENTAL RETARDATION, The President's Panel on Mental Retardation, August 1963.

acceptance and less than 1 percent had earnings of $40 or more per week. After receiving vocational rehabilitation (evaluation, training, placement, and related supportive services), only 7 percent of these individuals had no earnings and approximately 44 percent earned $40 or more per week.[5] (See chart 2.)

The presence of a mentally retarded, wholly dependent person in a family represents a financial burden to most households. When specialized education and training programs can salvage a mentally retarded person by making him gainfully employed, the living standard of that family moves upward. In addition, the Nation benefits from savings in public and private assistance costs as well as a decrease in delinquency and antisocial behavior which often result from society's indifference to the needs of mentally retarded youth.

CHART 2

EARNINGS OF THE RETARDED RISE MARKEDLY AFTER REHABILITATION



NOTE: Percents do not add to 100 because of rounding.

SOURCE: U.S. Department of Labor, Office of Manpower, Automation and Training, based on data from THE REHABILITATED MENTALLY RETARDED, U.S. Department of Health, Education, and Welfare, Vocational Rehabilitation Administration, April 1964.

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A PROFILE OF THE RETARDED

INCIDENCE

Between 85 and 90 percent of the 125,000 mentally retarded born each year can, with special training and assistance, acquire job skills and lead productive lives. About 10 percent are expected to be moderately retarded with IQ's between 20 and 50. These individuals will usually remain permanently below the intellectual level of a 7-year-old child. Approximately 3 percent will be severely retarded.[6] Even as adults, they will be unable to provide for their own needs and many will require institutional care. In 1963, more than 200,000 mentally retarded persons were in institutions,[7]—most of whom had entered before the age of 15.[8]

LABOR FORCE STATUS

The number of working-age (16 to 64) mentally retarded is expected to increase to 3.7 million by 1970. (See table following.) Data are not available on how many of the mentally retarded are in the labor force. However, in November 1963, a nationwide survey by the President's Task Force on Manpower Conservation of 2,500 young men (mostly between the ages of 18 and 24) rejected from military service for mental reasons provides information concerning the employment status and capabilities of young men who may be mentally retarded. More than one-half of these 2,500 rejectees scored from 0 to 9 on the Armed Forces Qualification Test; mentally retarded registrants would generally fall within this range, as would many other low-aptitude individuals. In general, it was found that only about two out of three of the young men who scored in the lowest tenth are in the labor force, as compared to more than 95 percent of all young men aged 18 to 24 who are not enrolled in school. Almost 30 percent of these handicapped young men were unemployed—actively, but unsuccessfully, looking for work at the time of the survey—as compared with 8.7 percent of all young men, not enrolled in school, between the ages of 18 and 24.[9]

SOCIOECONOMIC BACKGROUND

The President's Panel on Mental Retardation found that the majority of the mentally retarded are from the socially and economically deprived segments of the population.[10] The responsibility

for supporting these retarded individuals falls typically on those least able to carry this burden—the poorest families in our society. These families are not in a position to provide more than the bare necessities for living and have no resources to use for specialized education or training which the mentally retarded must have to improve themselves. Thus, a large share of the costs for supporting the mentally retarded is borne by society as a whole through its welfare activities.

Estimates of Mentally Retarded Population, 1950, 1963, and Projected 1970

[In thousands]

Age group	1950		1963		1970	
	U.S. population	Retarded	U.S. population	Retarded	U.S. population (Series B)	Retarded
Total, all ages	150, 697	4, 521	189, 278	5, 678	208, 996	6, 270
Under 1 year	3, 147	94	4, 075	122	4, 628	139
1 through 4 years	13, 017	391	16, 646	499	17, 386	522
5 through 15 years	26, 434	793	41, 511	1, 245	45, 270	1, 358
16 through 64 years	95, 830	2, 875	109, 479	3, 284	122, 142	3, 664
65 years and over	12, 270	368	17, 567	527	19, 571	587

Sources: 1950 data are from *U.S. Census of Population* and exclude Alaska and Hawaii and Armed Forces overseas. 1963 and 1970 data are from *Current Population Reports, Population Estimates*, Series P-25, No. 286, July 1964. The incidence of mental retardation was based on 3 per hundred total population for all 3 years. This does not take into account possible changes in incidence arising from better prenatal care, medical discoveries, etc.

The recent findings of the President's Task Force on Manpower Conservation also confirm the close relationship between poverty and mental retardation. More than a quarter of the military rejectees who scored less than 10 on the Armed Forces Qualification Test came from families whose annual incomes in 1962 were less than $2,000 and nearly two-thirds from families with annual incomes of less than $4,000.[11] In the total population, less than one-third of all families had incomes below $4,000 in 1962.[12] The Council of Economic Advisers has defined "poverty" as an annual family income of $3,000 or less.[13]

OCCUPATIONS FOR WHICH THE RETARDED CAN BE TRAINED

It is estimated that more than 85 percent of all children born each year who are or will become retarded could become capable of self-support in some degree, given adequate training and employment opportunities. Studies of the employment status of the mentally retarded indicate that they can be trained for a large number of jobs which draw heavily upon traits other than intelligence.[14] These occupations are usually of a routine or repetitive nature and are found principally in the semiskilled, unskilled, and service worker categories.

The retarded have proven particularly valuable employees because of their low turnover in jobs which many other workers are willing to hold only temporarily. The qualities which a retarded person brings to a job have been emphasized by the U.S. Civil Service Commission in connection with the Federal Government's program to employ retarded persons:

> Our own experience is showing us that retarded workers are highly motivated, are willing to work and eager to please, are reliable in attendance, and have a high tolerance (even preference) for the routine, repetitive tasks which often cause dissatisfaction and high turnover among other employees.[15]

The Department of Labor estimates that the employment of service workers is expected to increase at a rate considerably above the average for the entire work force in the years ahead. The number of workers in service jobs is expected to increase from 8.3 million in 1960 to 11 million in 1970, and to 12.5 million in 1975.[16]

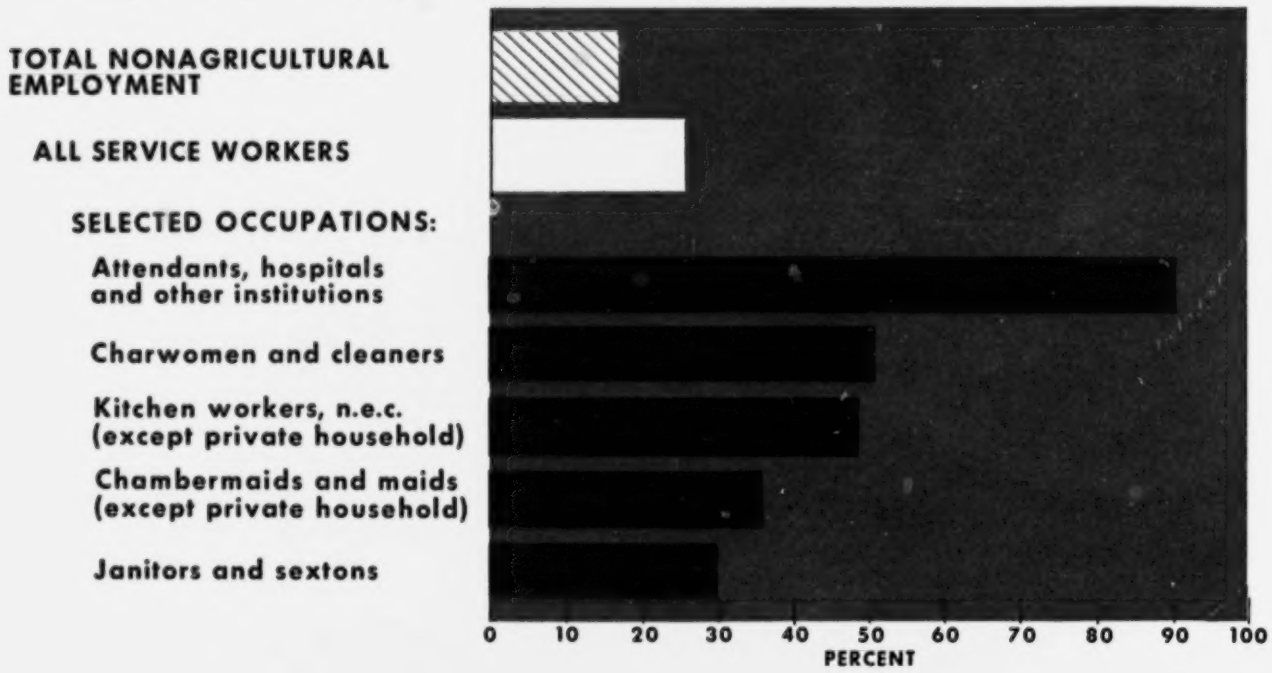
Service occupations constitute the fastest growing occupational area in which the retarded are likely to qualify for training and employment (see chart 3). An American Institute for Research survey of 48 public and private agencies serving the retarded indicated that the largest proportion of placements—46 percent—were made in service occupations.[17] Similarly, the Vocational Rehabilitation Administration reported that 40 percent of its placements of the retarded who were rehabilitated in 1963 were made in service occupations—the largest number placed in any single occupational category.[18]

In addition to the better placement opportunities associated with service occupations, the costs of training for these jobs are less than for factory occupations. In the Manpower Development and Training Program conducted by the U.S. Department of Labor and the U.S. Department of Health, Education, and Welfare under the Manpower De-

CHART 3

THE RETARDED CAN BE EMPLOYED IN CERTAIN RAPIDLY GROWING SERVICE OCCUPATIONS

Percentage Change in Employment for Selected Occupations and Occupational Groups, 1950-60



SOURCE: U.S. Department of Labor, Office of Manpower, Automation and Training, based on data supplied by the Bureau of the Census and the Bureau of Labor Statistics.

velopment and Training Act, for example, it has been determined that the costs of training nurses aides, orderlies, and other service workers are relatively low because the courses are short, offer no difficult curriculum problems, require little in the way of supplies and equipment, and either use existing facilities or require no special facilities.[19]

While the service worker category contains occupations for which intelligence may be considered significant, e.g., policemen and firemen, there are a large number of service worker jobs which can be performed by the mentally retarded.

The U.S. Vocational Rehabilitation Administration, for example, has had considerable success in placing retarded individuals as *kitchen workers.* Employment in these jobs increased almost 50 percent—204,000 to 304,000—between 1950 and 1960. The expected increase in eating establishments to serve a growing population with rising income levels is expected to provide expanded employment opportunities for the mildly retarded in *low skilled kitchen and food service jobs* such as *busboy, busgirl,* and *dishwasher,* which require a minimum of mental effort.

Hospitals and other institutions added nearly 200,000 *attendants* to their staffs during the 1950–60 decade—a more than 90 percent increase in this occupation—and a continued rapid expansion is expected in these jobs during the 1960 decade to meet the needs of an expanding population, particularly the increasing number of older persons. In June 1963, the State employment security agencies had posted 270 vacancies in this occupation in interarea recruitment because of inability to fill jobs locally. Retarded persons may be hired for some of these jobs (e.g., *orderlies, nurses aides*). Though some of the tasks involved may be considered menial by others, retardates benefit from a heightened sense of personal worth when performing simple tasks that visibly increase the well-being of persons entrusted to their care. By employing the mentally retarded, many hospitals and other institutions providing services for the sick and the aged can make better use of their more

highly skilled workers in a number of occupational categories where shortages exist.

Jobs as *janitors*, *charwomen*, and *maids* represent other kinds of service employment in which retarded persons have been successfully employed. These jobs consist of relatively routine tasks which change little from day to day. Employment trends have been rising generally in these occupations—the number of janitors increased 30 percent between 1950 and 1960 from nearly 460,000 to almost 600,000; charwomen increased by one-half from 120,000 to 180,000; and chambermaids and maids, except private household, rose more than one-third from 121,000 to 165,000. Similarly, *yardman*, *groundskeeper*, and *nursery and landscaping laborer* jobs offer good opportunities for the retarded—particularly those who prefer outdoor work. This area of employment has also grown steadily in recent years—gardeners (except farm) and groundskeepers increased from 146,000 in 1950 to more than 195,000 in 1960.

The U.S. Employment Service has found that retarded persons can be employed as assemblers of luggage-hardware, electrical motors and accessories, and toys and games. These jobs require an ability to compare size and shapes of small objects and good coordination in handling materials and parts. The number of all semiskilled assemblers increased by more than 60 percent from 378,000 to 614,000 between 1950 and 1960, indicating that this is another growing source of employment in which some retardates can find jobs.

TRAINING OF THE RETARDED

Proper vocational training is crucial for the job success of the retarded. The mentally retarded also have special needs for training in work adjustment. For example, they must acquire good work habits and learn to work with others. While the training resources available to prepare the retarded (both young people and adults) for employment have increased in recent years, the number of training opportunities is far short of those needed to fully develop the employment potential of the millions of retarded who could benefit from such programs.

REHABILITATION AND OTHER SERVICES FOR ADULT WORKERS

Training and other rehabilitation services are available to the retarded of working age through the Federal-State vocational rehabilitation system. The Vocational Rehabilitation Administration—a Federal agency—administers a program of matching-grants to the States, which in turn provide individual rehabilitation services, including evaluation, counseling, training, and placement, to the retarded who reasonably can be expected to obtain and retain jobs. Some services are provided directly by the State agencies; others are provided through private community facilities and agencies.

The number of retarded who were rehabilitated under the auspices of State vocational rehabilitation agencies increased from 106 in 1945 to 5,900 in 1963—more than 4,000 of whom were between 15 and 19 years of age. It is expected that 7,500 retarded persons will receive these services in 1964.[20]

If, as experts estimate, more than 85 percent, or 110,000 of the 125,000 retarded persons born each year, can be trained for productive employment the number now being trained falls far short of the kind of nationwide effort needed to provide the skills to make these handicapped persons full participants in our society. The eventual economic and social benefits arising from this type of investment in human beings far outweigh the costs.

A large proportion of the retarded receiving training under the vocational rehabilitation system are trained in the Nation's sheltered workshops. Others are trained in public vocational schools, on the job in private firms or in private trade schools.[21]

Sheltered workshops (not-for-profit institutions which provide remunerative employment as well as rehabilitation services to the handicapped) provide situations in which the retarded can acquire,

under noncompetitive conditions, good work habits as well as the experience and skill development needed for employment. As of June 30, 1964, there were approximately 170 sheltered workshops primarily serving the retarded. These workshops served about 5,500 clients, the majority of whom are retarded.[22] (The preceding figures do not include those workshops which primarily serve other handicapped groups.)

Placement of the mentally retarded in service jobs has had the highest rate of success, and training for the growing service occupations will probably provide the best employment opportunities for retardates. However, the typical workshop concentrates on assembly and bench work operations largely because of the availability of contract work in these areas.[23] A redirection in many of the training programs and types of work undertaken in workshops may be needed if they are to realistically prepare large numbers of trainees for nonworkshop employment opportunities.

TRAINING OF PRE-WORKING AGE MENTALLY RETARDED

The Nation's elementary and secondary schools can play an important role in the identification and training of children with below average intellectual ability. However, only a small proportion of the 75,000 retarded youth who leave school each year have had the opportunity to attend special education classes.

The number of school-age pupils in public school special education classes for the mentally retarded more than doubled from 87,000 to 223,000 between 1948 and 1958.[24] Yet, despite the increase in the number of retarded children receiving special education, only about 20 percent of the estimated 1¼ million retarded children of school age in 1958 had an opportunity to participate in special education classes.[25]

For the mentally retarded of secondary school age, school systems have increasingly, during the past decade, introduced special educational programs within the framework of the secondary school rather than terminating the education of these students at the conclusion of elementary or junior high school at the age of 16.[26] Some schools offer retarded young people combined school-work programs [27] and paid, on-the-job training in cooperation with local industries.

MANPOWER DEVELOPMENT AND TRAINING ACT (MDTA)

Persons selected for training in the initial two years of the MDTA have had considerably higher levels of educational attainment than generally achieved by the retarded. In the regular programs of the MDTA, less than 3 percent of the trainees have had below an eighth grade education, yet the educational achievement of most retarded persons is below this level of education.

However, a number of promising experimental and demonstration projects have been developed under MDTA which may serve as landmarks in an expanded effort to help mentally retarded persons. One demonstration project in New York, for example, provides on-the-job training for 90 mentally retarded (IQ's between 60 and 80) and severely handicapped youth in key punch and typing operations, and in glass etching. In addition, this project will also be used as the basis for the experimental development of programed teaching systems to train the retarded in other occupations for which they are suited.

Three other projects reflect the range and variety of experimentation being undertaken. One, conducted in cooperation with the National Association for Retarded Children, is developing 12 community programs designed to maximize employment opportunities for the mentally retarded and to initiate training programs for persons to work with the retarded. In another, a children's home in San Mateo, Calif., is conducting an experimental program to train severely retarded youth and adults so that they can obtain full-time employment in sheltered workshops. In a third project in Maryland, training is being provided to young men and women (ages 16 to 21) with normal IQ's for employment in health agencies, schools, and rehabilitation centers for mentally retarded children. For 32 weeks some 40 trainees

will work on the job—learning to assist teachers; speech, physical, and occupational therapists; and nurses and/or physicians in their rehabilitation and care programs.

Additional assistance to the retarded may be available under regular training programs because of recent amendments to the MDTA. It is now possible to provide a combined program of both occupational and basic educational training in reading, writing, language skills, and arithmetic for a period up to 72 weeks, to unemployed individuals who need such basic educational training to qualify for and benefit from occupational training. It is hoped that some employable retarded persons will benefit from these new programs. This can be an especially valuable resource for training additional numbers of retarded adults in view of the small proportion who now benefit from rehabilitation efforts in other programs.

EMPLOYMENT SERVICE PROGRAMS TO HELP THE RETARDED

The Federal-State employment service system provides special services to handicapped applicants, including those mentally retarded who are employable. Through its counseling, testing, and placement services, the Employment Service identifies and assesses the employment needs and capacities of the employable retarded, and assists them in making satisfactory work adjustments. Unfortunately, these specialized services are provided only to the small proportion of the mentally retarded persons who have been previously identified as retarded by other agencies or institutions. The public employment service, for example, provides placement services for retarded persons who have completed the vocational rehabilitation or public school special education programs.

NEW TRAINING AND EMPLOYMENT POSSIBILITIES

Public awareness of the training and employment needs and potential of the retarded has been heightened in recent years by the work of national organizations which serve these disadvantaged individuals and by such governmental groups as the President's Committee on Employment of the Handicapped and the President's Panel on Mental Retardation.

Recent actions by the Federal Government point to increased public activity to provide the retarded with gainful employment. The Civil Service Commission has established a new employment policy to open up Federal employment opportunities to the retarded. Authority was granted in December 1963, for a 2-year period, to Federal agencies to exempt the retarded from the usual qualifying examinations. Individual agencies may make appointments on the basis of certificates of qualification issued by State rehabilitation agencies. Mentally retarded persons have been placed in a variety of Federal jobs—many as messengers and general clerks.

In October 1963, the 88th Congress enacted two major pieces of legislation which were designed to help the retarded—the Mental Retardation Facilities and Mental Health Centers Construction Act and the Maternal and Child Health and Mental Retardation Planning Amendments of 1963 (to the Social Security Act).

The Mental Retardation Facilities Construction Act authorizes a total expenditure of $26 million during fiscal years 1964 through 1968 for the building of non-profit centers for research on mental retardation. The act also provides for the building of clinical facilities associated with colleges or universities which will provide a full range of in-patient and out-patient services for the retarded, and provides for grants to the States for the construction of facilities for the care of the retarded. The act further provides for the strengthening and expansion of programs for the training of all teachers of the handicapped, including the retarded.[28] This latter provision may serve to alleviate the serious current shortage of these professional personnel.

The 1963 Maternal and Child Health and Mental Retardation Planning Amendments to the Social Security Act are expected to significantly improve services for the prevention and treatment of mental retardation. The amendments include provisions for a 5-year program of grants to public health agencies for projects to provide necessary health care for low-income expectant mothers. (Retardation is higher among groups in which maternity care is inadequate.) Most significantly, the amendments authorize an appropriation of $2.2 million for grants to assist the States in developing plans for comprehensive State and community action to combat mental retardation.[29]

As of the beginning of September 1964, all but two States had been awarded funds under these amendments to develop plans for comprehensive mental retardation programs. In addition to these grants, the Department of Health, Education, and Welfare offers a wide range of professional and technical services to States, groups, and individuals interested in improving and extending services to the mentally retarded.

Based on the magnitude of the need, these measures represent only first steps. Much remains to be done at the State and community levels in providing needed training and employment assistance to the retarded. As this report has indicated, the special educational and training needs of the more than 3 million retarded persons of working age are largely unmet. Apparently only a small percentage have benefited during their crucial formative years from special educational programs in public schools. An even smaller proportion are receiving vocational rehabilitation assistance in sheltered workshops, on the job, or in other training facilities.

Our society has apparently not yet made the decision to make the kind of social and economic investment which will have a significant impact upon the training needs of large numbers of mentally retarded. Until this decision is reached, many retardates will have to endure the loss of dignity, isolation from society, and other byproducts of long-term idleness throughout most of their working lives.

Studies have shown that with proper training and pre-employment preparation, the retarded can qualify for productive work in a large number of occupations. Greater efforts will be required of government, industry, and private agencies to prepare these individuals for the world of work and for full participation in the life of the community.

While improved vocational training and employment opportunities can significantly affect the welfare of the retarded, they are addressed to the results rather than the causes of mental retardation. Of equal, if not greater importance, is the task of eradicating poverty, a root cause of the cultural deprivation and related environmental conditions which so often result in arrested intellectual development among the Nation's poor.

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2. See table on page 6 for projection, and *Mental Retardation*, idem.

3. See, for example, *Mental Retardation: A National Plan for a National Problem*, The President's Panel on Mental Retardation, August 1963, p. 8, and R. O. Peterson and Edna M. Jones, *Guide to Jobs for the Mentally Retarded*, American Institute for Research, 1964, p. 7.

4. The literature contains varying estimates of the incidence of mental retardation. For the purpose of this report, mental retardation is defined as an intelligence quotient of about 70 or less—the cut-off used by the President's Panel on Mental Retardation in estimating the incidence of retardation. (*Mental Retardation: A National Plan for a National Problem*, op. cit., p. 6.)

5. *The Rehabilitated Mentally Retarded*, U.S. Department of Health, Education, and Welfare, Vocational Rehabilitation Administration, 1964, p. 16.

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9. Unpublished data collected for *One-Third of a Nation: A Report on Young Men Found Unqualified for Military Service*, President's Task Force on Manpower Conservation, 1964, and Special Labor Force Report No. 42, U.S. Department of Labor, Bureau of Labor Statistics, p. A–5.

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13. *Annual Report of the Council of Economic Advisers*, January 1964, p. 58.

14. Information on occupations of the retarded is based on an analysis of the following materials: (1) Unpublished data on Selective Service rejectees who scored 0–9 on the AQFT, collected for *One-Third of a Nation*, op. cit.; (2) Vocational Rehabilitation placement records (*Mentally Re-*

tarded Rehabilitants, Rehabilitation Service Series No. 569, June 26, 1961, Table N–78); (3) *Guide to the Use of the General Aptitude Test Battery*, Section III, U.S. Department of Labor, Bureau of Employment Security, October 1962, pp. 60–61.

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21. *Mentally Retarded Rehabilitants*, op. cit., p. 13.
22. Certificated under the Fair Labor Standards Act by the Wage and Hour and Public Contracts Divisions of the U.S. Department of Labor.
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